

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

IN RE:

Chapter 7

**James E. & Cynthia A. Jogan
Debtors**

**Case No. 13-15387
Judge Price-Smith**

DEBTORS' MOTION TO DELAY ENTRY OF DISCHARGE

Now comes Debtors, through counsel, and moves this Court for an order delaying the entry of discharge for 60 days. In support, Debtors states as follows:

1. Counsel for Debtors requested from creditor a certain reaffirmation agreement.
2. Counsel for debtors has been in the process of negotiating adjusted terms on the certain reaffirmation agreement. Such negotiations and execution by Debtor have taken until now to complete; thus additional time is required to have reaffirmation agreement filed prior to discharge.

Wherefore, debtors prays this Court enter an order delaying the entry of discharge to on or after **January 7, 2014** and for such other relief as this Court deems just.

Respectfully submitted,

/s/Debra Booher
Debra E. Booher (#0067804)
Attorneys for Debtor
1350 Portage Trail
Cuyahoga Falls, OH 44223
Tel (330) 253-1555
Fax (330) 253-1599
charlotte@bankruptcyinfo.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed by U.S. Mail, postage prepaid, this _____^{8th} day of November, 2013 upon the following parties in interest:

The Office of the U.S. Trustee at: (Registered address)@usdoj.gov
Lauren Helbling, Trustee at: lauren@helblinglpa.com
James E. & Cynthia A. Jogan, Debtors via regular mail at: 7683 Hoertz Rd. Parma, Oh 44134

/s/Debra Booher
Debra E. Booher, #0067804